

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

ALISHA W. WILKES,

Plaintiff,

v.

GMAC MORTGAGE, LLC, *et al.*,

Defendants.

Civil No. 1:10-cv-01160 (CMH-TRJ)

**DEFENDANT GMAC MORTGAGE LLC'S MOTION *IN LIMINE* TO PROHIBIT ANY
CLAIM, ARGUMENT OR EVIDENCE ON HER CLAIM FOR DEFAMATION THAT
OCCURRED PRIOR TO MARCH 1, 2010 AND AFTER AUGUST 12, 2010**

Defendant GMAC Mortgage LLC, by counsel, moves this Court for entry of an Order entry of an Order prohibiting Plaintiff at trial from making any mention of or reference to, or argument or claim concerning, by any party herein, in opening statements, in the questioning of witnesses and expert witnesses, in documentary evidence and exhibits, in closing arguments or in any other manner before the jury, or introducing any evidence on her claim for defamation, regarding events occurring before March 1, 2010 and after August 12, 2010, and for a instruction so informing the jury of this limitation on Plaintiff's claim for damages for alleged defamation.¹

WHEREFORE, for the reasons set forth in Defendant's accompanying Memorandum in Support filed simultaneously, GMAC Mortgage, LLC, requests this Court grant its foregoing Motion *in Limine* and for such other and further relief as this Court deems appropriate and just.

¹ Defendant will be filing a motion for summary judgment on Plaintiff's claim for defamation. This Motion *in Limine* is filed in the alternative to the relief sought in the Motion for Summary Judgment

Dated: July 7, 2011

Respectfully Submitted,

GMAC MORTGAGE LLC

By: /s/ John C. Lynch
Of Counsel

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CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of July, 2011, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following CM/ECF participants:

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